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 Counsel for Plaintiffs  
 Carpenters Pension Trust Fund for Northern California; and  
 Board of Trustees, Carpenters Pension Trust Fund for  
 Northern California

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO / OAKLAND DIVISION

CARPENTERS PENSION TRUST FUND )  
 FOR NORTHERN CALIFORNIA, et al., )  
  
 Plaintiffs, )  
  
 v. )  
  
 LINDQUIST FAMILY LLC, et al., )  
  
 Defendants. )  
 \_\_\_\_\_ )

Case No.: C13-1063 SC

**STIPULATION AND ~~PROPOSED~~ ORDER  
 EXTENDING DEADLINE TO SUBMIT  
 FURTHER JOINT DISCOVERY LETTER**

Honorable Donna M. Ryu

WHEREAS on January 17, 2014, this court issued an order in which Judge Ryu directed  
 counsel for Plaintiffs and counsel for Ms. Bockmiller to engage in further meet and confer efforts  
 and set a deadline of January 31, 2014 for them to submit a further Joint Discovery Letter regarding  
 any remaining disputes, and

WHEREAS on January 23, 2013 counsel for Plaintiffs, Donna Kirchner, and counsel for  
 Ms. Bockmiller, Neil Bui, engaged in further meet and confer discussions by telephone but were  
 unable to resolve the entire dispute, and

WHEREAS two depositions are scheduled in this case on January 30, 2014 and Plaintiffs'  
 counsel has summary judgment briefing due in an unrelated case on January 31, 2014, which limits

1 the time available for the parties to prepare the joint letter regarding Ms. Bockmiller's document  
2 production, and

3 WHEREAS time is needed for Ms. Bockmiller to produce the additional documents her  
4 counsel has agreed to produce and for Plaintiffs' counsel to review the documents,

5 THEREFORE,

6 The parties hereby stipulate, and jointly request, that the court extend the deadline set for  
7 submitting a further Joint Discovery Letter be extended from January 31, 2014 to February 5, 2014.

8 DATED: January \_27\_, 2014 KRAW & KRAW LAW GROUP

9  
10 By: /s/ Donna Kirchner  
11 DONNA L. KIRCHNER  
12 Attorneys for Carpenters Pension Trust Fund for Northern  
13 California; and Board of Trustees, Carpenters Pension Trust  
14 Fund for Northern California

15  
16 DATED: January \_27\_, 2014 McINERNEY & DILLON

17 By: /s/ Neil Bui  
18 NEIL BUI  
19 Attorney for Non-Party Lauren Bockmiller and Defendants  
20 Lindquist Family LLC and Elsie Lindquist

21 For good cause shown, IT IS SO ORDERED.

22 Dated: January 27, 2014

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24 \_\_\_\_\_  
25 Hon. Donna M. Ryu  
26 UNITED STATES MAGISTRATE JUDGE  
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